



GEORGETOWN LAW  
INSTITUTE FOR PUBLIC REPRESENTATION

Hope M. Babcock  
Angela J. Campbell  
Brian Wolfman  
Directors  
Thomas Gremillion  
Anne King  
Laura M. Moy\*  
Margot J. Pollans  
Blake E. Reid  
Staff Attorneys

600 New Jersey Avenue, NW, Suite 312  
Washington, DC 20001-2075  
Telephone: 202-662-9535  
TDD: 202-662-9538  
Fax: 202-662-9634

November 5, 2012

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12 St. SW  
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation, MM Docket No. 99-25 – Creation of a  
Low Power Radio Service

Dear Ms. Dortch:

On Thursday, November 1, Brandy Doyle of Prometheus Radio Project and Angela Campbell and Laura Moy of the Institute for Public Representation, Counsel for Prometheus Radio Project (collectively “Prometheus representatives”), spoke by telephone with Peter Doyle of the Media Bureau and Elizabeth Andrion and Lyle Elder of Chairman Genachowski’s office.

Prometheus representatives reiterated our support for a second-adjacent frequency waiver standard modeled after the FM translator rules, removal of IF protection requirements, retaining the 50-application and per-market caps for translators, and providing a preference point for LPFM applicants who pledge to maintain a main studio.

\* Admitted to the Maryland bar only; DC bar membership pending. Practice supervised by members of the DC bar.

Prometheus representatives also explained that we continue to believe a local origination requirement is necessary to ensure that LPFM licenses are awarded to applicants that are well-situated to serve local needs. Requiring 20 hours per week of local origination from LPFM licensees would not be unduly burdensome; it would be less than the eight hours per day currently required to obtain a local origination preference point. At the same time, such a requirement would better ensure that scarce LPFM licenses are awarded to genuine local groups with the capacity and intent to serve their communities.

Finally, Prometheus representatives urged the Commission to vote on the LPFM item this fall and to adopt rules that will provide sufficient time for community groups with limited resources to prepare their applications.

Respectfully submitted,

/s/

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Angela J. Campbell  
Laura M. Moy  
Institute for Public Representation  
Georgetown Law  
600 New Jersey Avenue, NW  
Suite 312  
Washington, DC 20001  
(202) 662-9535  
lmm258@law.georgetown.edu

*Counsel for Prometheus Radio  
Project*

November 5, 2012

cc: Elizabeth Andrion  
Peter Doyle  
Lyle Elder